

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

PIERCE COUNTY REPUBLICAN PARTY, an  
unincorporated association,

Plaintiff,

V.

ERIC CROWL, an individual,

PIERCE COUNTY REPUBLICAN PARTY, a  
nonprofit corporation,

& WASHINGTON 47 PAC, a nonprofit corporation.

## Defendants.

Case No. 3:25-CV-05251-BHS

REPLY TO RESPONSE TO  
PLAINTIFF'S SECOND MOTION FOR  
SANCTIONS

ERIC CROWL, an individual,  
PIERCE COUNTY REPUBLICAN PARTY, a  
nonprofit corporation,  
& WASHINGTON 47 PAC, a nonprofit  
corporation.

COMES NOW PLAINTIFF PIERCE COUNTY REPUBLICAN PARTY, by and  
through their counsel of record Conner Edwards, and respectfully submits this REPLY TO  
RESPONSE TO PLAINTIFF'S SECOND MOTION FOR SANCTIONS

## 1. RESPONSE

Defendant Crowl's Response is without merit. We will respond to each substantive argument in turn.

111

111

111

111

REPLY TO RESPONSE TO PLAINTIFF'S SECOND MOTION FOR SANCTIONS- 1

**Defendant Crowl's Argument: Sanctions should not be granted because Defendant Crowl was unaware he could not represent his two nonprofit entities until 7/10/25.** This is completely false. In his filing on 4/17/25 (Docket Item 21) Defendant Crowl wrote:

Case 3:25-cv-05251-BHS Document 21 Filed 04/17/25 Page 2 of 4

1 The Western District of Washington follows the general federal rule that corporations, including  
2 nonprofits, must be represented by a licensed attorney. This is based on case law (e.g., *Rowland v.*  
3 *California Men's Colony*, 506 U.S. 194 (1993)) and local court practices. Filing documents without  
4 an attorney may lead to the court striking your filings or dismissing your defense.

This indicates that Defendant Crowl was well aware he could not represent his nonprofit entities as early as April, three months prior to the filing of the Motion at issue.

**Defendant Crowl's Argument: Sanctions should not be granted because Plaintiff's FRCP 11 Motion for Sanctions fails to cite to the specific references of RCW 24.03A.245 and WAC 434-112-085.** This is a baseless defense. Defendant Crowl's Motion to Dismiss was only 7 pages long and the references are easily findable. See pg. 2, line 19 & pg. 6 lines, 12-14 & pg. 7, lines 13-14 of Docket Item 41 "DEFENDANT'S MOTION TO DISMISS; AND QUASH SERVICE".

**Defendant Crowl's Argument: Sanctions should not be granted just because Plaintiff disagrees with the legal theories advanced by Defendant regarding RCW 24.03A.245 and WAC 434-112-085.** This is a baseless defense. There is no mere disagreement here. Defendant Crowl simply lied to the Court about what the statutes at issue actually say.

1           **Defendant Crowl's Argument: Sanctions should not be granted because Plaintiff did not**  
2           **file the appropriate process for filing a motion for sanctions per FRCP 11(c)(2).** This  
3           assertion is totally false. As indicated in the 2nd Motion for Sanctions, it was originally  
4           mailed to Defendant Crowl (but not filed with the Court) on July 20, 2025 as required by  
5           FRCP 11(c)(2). Additionally, it was also e-mailed to Defendant Crowl, see below.  
6

8/21/25, 8:18 PM

Gmail - Response to Motion To Dismiss &amp; Motion for Sanctions per FRCP 11 (3:25-CV-05251-BHS)



Conner Edwards &lt;cg.edwards53@gmail.com&gt;

---

**Response to Motion To Dismiss & Motion for Sanctions per FRCP 11 (3:25-CV-05251-BHS)**

---

Conner Edwards <cg.edwards53@gmail.com>  
To: Eric Crowl <Eric.Crowl@citizenobservers.org>

Sun, Jul 20, 2025 at 9:59 PM

12           Hello Mr. Crowl:

13           See attached. Physical versions are being mailed to you as well.

14           Pursuant to FRCP 11(c)(2), the Motion for Sanctions will not be filed if you withdraw/amend your frivolous motion within  
21 days.15           **Conner Edwards**  
16           Attorney, CG Edwards, PLLC  
17           PO Box 12082  
18           Seattle, WA 98102  
19           WSBA # 62961  
20           (425) 533-1677 cell  
21           CG.Edwards53@gmail.com

---

**2 attachments** SecondMotionForFRCP11Sanctions.pdf  
234K FinalResponseToMotionToDismiss.pdf  
338K

## II. CONCLUSION

For the foregoing reasons, we respectfully request that the Court Grant Plaintiff's Motion for Sanctions.

DATED this August 21, 2025

## CG EDWARDS PLLC

**Conner Edwards, WSBA No. 62961  
Attorney for Plaintiff PCRP**

**CERTIFICATE OF SERVICE**

I certify that I mailed a copy of the foregoing REPLY TO RESPONSE TO PLAINTIFF'S SECOND MOTION FOR SANCTIONS and accompanying documents to ERIC CROWL, at 10002 112th St SW, Lakewood, WA 98498, postage prepaid.

**August 21, 2025**

Date

Emilia Lai

**Conner Edwards, WSBA No. 62961  
Attorney for Plaintiff Pierce County Republican Party**